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June 6, 2011  
(electronic mail only)

Ms. Diane Gard, Case Manager  
Bureau of Underground Storage Tanks  
Site Remediation Program  
New Jersey Department of Environmental Protection  
401 East State Street, 5<sup>th</sup> Floor  
Trenton, New Jersey 08608

**Re: Preliminary Assessment and Remedial Investigation Reports  
Correction and Explanation  
SRP PI# 510630, Palmer Industries, Inc.  
59-97 Chapel Street Rear, Block 2442, Lot 3  
Newark City, Essex County, New Jersey**

Dear Ms. Gard:

In response to our conversation on the matter, I've prepared this letter to deal with three issues:

1. The inadvertent reference to inclusion of an RAO in the package has been removed from the last paragraph on page RIR-1. A corrected page is attached to this letter for your file; and
2. Specific discussion regarding elevated method detection limits noted on the PA-SI form for each grouping of such data is:
  - a. Table 1-2 showed slightly elevated MDLs for some polynuclear aromatic hydrocarbons (PAHs). Both of the samples involved (T1-1 and T2-1) were excavated as part of the remedial investigation. Additionally, the values were only fractionally above the operative Soil Remediation Standards and well within the generic values for those compounds attributable to historic fill. This matter would have been addressed in greater detail within the Remedial Action Report and Deed Notice that would have been prepared had the site not been taken away through eminent domain.
  - b. Table 1-3 reported elevated MDLs for a number of volatile organic substances in all four post-excavation samples around UST 3 (samples T3-1, T3-2, T3-3 and T3-4). The MDLs exceeded only the Impact to Ground Water Soil Screening Levels and did not approach the SRS for these compounds. Regardless, the soil in those areas was excavated as part of the general investigation. The ensuing ground water sampling showed no significant levels of any of these materials, eliminating this matter as a concern.
  - c. Table 1-7, detailing analytical results from soil samples taken during installation of ground water monitoring well MW14, showed a number of MDLs in excess of the IGWSSL for several volatile organics. Analytical results from MW14, obviously located at the exact spot

where these samples were taken, showed only benzene above the Ground Water Quality Standards, at 2.46 micrograms per liter compared with a limit of 1 ug/l. On that basis the, the IGWSSL limits are not a matter of concern; and

3. Finally, the trichloroethene (TCE) observed in MW8A is considered anomalous based on the absence of any indication in site history of its use on the property. Further investigation might have been indicated had the project been taken to conclusion; however, given the documented tidally-induced reversal of ground water flow throughout the property and the detected salt-water intrusion, we had planned to reclassify the ground water below this site to III-B as part of the Remedial Action Report, eliminating both the TCE and the low-level residual benzene levels noted above from further concern.

As you requested, the contact information that I have regarding the possible new LSRP for this site is:

Jeffrey Farrell  
Paulus, Sokolowski & Sartor  
67B Mountain Boulevard Extension  
Warren, New Jersey 07059  
(732) 684-0302

Thank you for the quick response and your courtesy in this matter. Please feel free to call or e-mail me if I can be of additional assistance to you.

Very truly yours,  
*Pennjersey Environmental Consulting, Inc.*



Richard J. Katz, M.S., LSRP  
President

enc.

- c: C. Guido, Palmer Industries (electronic copy only)  
R. Chambers, Esq. (electronic copy only)  
J. Buonocore, Esq. (electronic copy only)  
G. Duus, Esq. (electronic copy only)  
M. Brogan (electronic copy only)  
J. Farrell (electronic copy only)  
M. Ash, Esq. (electronic copy only)

SRP PI# 510630  
PALMER INDUSTRIES, INC., 59-97 CHAPEL STREET REAR  
NEWARK CITY, ESSEX COUNTY, NEW JERSEY  
MAY 2011

**REMEDIAL INVESTIGATION REPORT**

INTRODUCTION

This report details the remedial activities conducted at an undeveloped piece of property along the Passaic River in Newark City, Essex County, New Jersey. The site – known as Palmer Industries, Inc. – is identified on the tax rolls of Newark as Lot 3 in Block 2442 and as 59-97 Chapel Street Rear. The environmental investigation was triggered initially as a matter of general due diligence on the part of the property owner but was since modified based on a taking of the property by Essex County under eminent domain. This is one of three contiguous sites being taken by the County for conversion to a park and recreation area. The agreement regarding compensation was recently completed and, upon submittal of this set of documents, the project will be taken over by a Licensed Site Remediation Professional (LSRP) retained by the County.

Roughly triangular, the site is 3.421 acres and is located behind an apartment complex and is accessible through a small gate on Brill Street, with primary access through a neighboring property at 99 Chapel Street and then by an easement running along the Passaic River. The conjoined properties are full fenced or secured by the river. Although the site saw long-term use as an industrial facility, it has been undeveloped since purchase by the current owner in 1982. During that time, the only operation conducted was the storage of empty shipping containers and trailers.

During the course of this investigation, a number of subsurface anomalies were identified and eliminated as environmental concerns. These included innocuous matters such as buried chunks of concrete as well as five large Underground Storage Tanks (USTs). The only soil issue remaining at the site is the presence of historic fill, which is ubiquitous to the local area. Minor ground water contamination remains in isolated locations within the site in the form of benzene and trichloroethene with minor contamination in the form of heavy metals found related to historic fill that underlies the entire site. No structures lie within 100' of the known or presumed ground water contamination; no vapor intrusion investigation was needed. A tidal study showed that the flow beneath the site reverses completely with each change of tides and the water is adversely affected by salt-water intrusion.

The culmination of this work will involve imposition of a deed notice and either establishment of a Classification Exception Area (CEA) or a reclassification of the ground water due to the salt-water intrusion. Decisions regarding these matters and the ultimate details will be determined by the next LSRP retained.

The sections of this overall package contain the PAR, this RIR, 15 appendices related to the various reports, background LSRP forms and notices and complete laboratory reports for all sampling events in both hard copy and Electronic Data Interchange (EDI) format.